



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION-5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

December 18, 2007

REPLY TO THE ATTENTION OF

Mr. Paul Bucholtz  
Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Constitution Hall  
525 W. Allegan St., 3rd Floor South  
Lansing, MI 48909-7926

SR-6J

RE: Draft Michigan Department of Environmental Quality (MDEQ)  
Quality Assurance Project Plan (QAPP) for the Allied  
Paper Incorporated/Portage Creek/Kalamazoo River  
Superfund Site

Dear Mr. Bucholtz:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the draft MDEQ QAPP for the Allied Paper Incorporated/Portage Creek/Kalamazoo River Superfund Site. Although the QAPP is technically sound there are some laboratory standard operating procedures that need to be submitted. U.S. EPA has enclosed comments on the QAPP that need to be addressed.

Therefore, U.S. EPA disapproves the MDEQ QAPP for the Allied Paper, Incorporated/Portage Creek/Kalamazoo River Superfund Site. MDEQ should provide a revised QAPP addressing the attached comments to U.S. EPA for approval.

If you have any specific questions regarding U.S. EPA's comments please contact Richard L Byvik (312)353-3114 of the U.S. EPA Field Services Section or contact me directly at (312) 886-0992.

Sincerely,

James A. Saric  
Remedial Project Manager  
SFD Remedial Response Branch #1

Enclosure

US EPA RECORDS CENTER REGION 5



406961

bcc: Eileen Furey, ORC w/enclosure  
Richard Byvik, w/enclosure, U.S. EPA, SMF-4J  
Mike Ribordy, w/enclosure, U.S. EPA, SRF-5J

# **U.S. EPA Comments on the MDEQ QAPP for the API/PC/KR Superfund Site TCRA Oversight**

**A Title/Approval Page**

Include signature line for **Northeast Analytical, Inc. (NEA)** Laboratory Director.

**B Element A.3**

Include **Jim Saric** USEPA Region V Remedial Project Manager.

**C Element A.4.A, typo**

Amend Jim Sarik, to **Jim Saric**.

**D Figure A4-1**

Amend James Sarik, to **James Saric**.

**E Element B.4**

The references to Table A6-1, perhaps, should be Table A7-2 or Table A7-3.

**MDEQ** SOP# 403 was not provided.

**F Element B.5**

The reference to Table A6-2, perhaps, should be Table A7-2. Please clarify.

**G Element B.7.A**

Dissolved Oxygen (DO) and Redox Potential (ORP) should be included, too. See QAPP Table A7-2.

**H Elements D.1 and D.2**

The US EPA CLP Organic NFGs are only directly applicable to the CLP protocols. This project is not employing any of the CLP protocols. Data validation SOPs should be prepared based on QAPP requirements and laboratory SOPs. All the referenced CLP NFGs have been updated.

**Appendix A API/PC/KR Superfund Site TCRA**  
**Sampling and Analysis Plan**

**A     Table 3-1 and Section 3.1.2**

If only a one 1-liter amber glass bottle will be sent to NEA, a reanalysis will not be possible.

**B     Section 3.6**

Provide copies of the Chain of Custody, Custody Seal, and Sample Label.

**C     Section 4**

Include the maps of Soil/Sediment, Surface Water, and Groundwater sampling locations when finalized.

**D     Attachment A SOP Water Sampling Section A.3.2**

Describe the purpose of the 500 ml plastic bottle.

**E     Attachment B SOP Low Flow Water Sampling Section B.5, item 13**

Normally VOC samples are collected first, before PCB samples.

**F     Attachment C YSI Environmental Operations Manual**

Manufacture instrument manuals do not have to be provided and should not be included with the QAPP.

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY(MDEQ)**  
**LABORATORY STANDARD OPERATING PROCEDURES (SOPs)**

MDEQ must provide the following SOP:

**SOP 502**      Organochlorine Pesticides, Polychlorinated Biphenyls (PCB's) and Chlorinated Hydrocarbon Organic Compounds by Gas Chromatography with Electron Capture Detection (GC/ECD)

**SOP 502** was not on the CD provided by CDM.

**I      PRESSURIZED FLUID EXTRACTION (ACCELERATED SOLVENT EXTRACTION) SOP# 401**

Section 14.1.8.5 and Section 12.7.7 of MDEQ SOP# 405

Provide SOPs for the cleanup methods that may be necessary, such as, SOP# 402 Silica Gel and SOP# 403 Florisil. Also, Sulfuric Acid cleanup procedures should be included, too.

**NORTHEAST ANALYTICAL INC (NEA)**  
**LABORATORY STANDARD OPERATING PROCEDURES (SOPs)**

**NEA** must provide an SOP for Gel Permeation Chromatography (GPC), in case the PCB extracts need GPC cleanup. **MDEQ** may be using GPC to cleanup extracts.

**NEA** should provide SOP, possibly NE006, based SW 846 Method 3510c, Separatory Funnel Liquid-Liquid Extraction. **MDEQ** is using this aqueous extraction procedure.

**I      STANDARD OPERATING PROCEDURE FOR EXTRACTION AND  
PREPARATION OF AQUEOUS SAMPLES BY SW-846 METHOD 3520C  
FOR SUBSEQUENT ANALYSIS BY EPA METHOD 8082  
COMPREHENSIVE QUANTITATIVE CONGENER SPECIFIC  
ANALYSIS NE142\_07.SOP**

This SOP appears to be same as NE118\_07.DOC.

**II     Standard Operating Procedure for the Determination of Polychlorinated  
Biphenyl (PCB) Aroclors by US-EPA SW-846 Method 8082 NE148\_05.DOC**

Section 8.3

**MDEQ** will likely be calibrating with Aroclor 1016 and Aroclor 1260 and single point concentrations for the rest of the Aroclors. This Calibration procedure using all Aroclors and concentration levels may not be necessary.

Attachment B may not be complete.